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11  
12 **UNITED STATES DISTRICT COURT**  
13 **DISTRICT OF NEVADA**

14 JPMORGAN CHASE BANK N.A.,

15 Plaintiff,

16 vs.

17 FIDELITY NATIONAL TITLE GROUP,  
18 INC.; FIDELITY NATIONAL TITLE  
19 INSURANCE COMPANY; FIDELITY  
20 NATIONAL TITLE AGENCY OF NEVADA,  
21 INC.; DOE INDIVIDUALS I through X; and  
22 ROE CORPORATIONS XI through XX,  
23 inclusive,

24 Defendants.

Case No.: 2:20-cv-02188-APG-BNW

25 **STIPULATION AND ORDER TO**  
26 **EXTEND TIME PERIOD TO RESPOND**  
27 **TO MOTIONS TO DISMISS [ECF Nos.**  
28 **22-24]**

**[First Request]**

Plaintiff, JPMorgan Chase Bank N.A. (“JPMorgan”) Specially-Appearing Defendant Fidelity National Title Group, Inc. (“Fidelity”) and Defendants Fidelity National Title Insurance Company (“Fidelity National”) and Fidelity National Title Agency of Nevada (“Fidelity Agency”, collectively “Defendants”), by and through their counsel of record, hereby stipulate and agree as follows:

1. On December 1, 2020, JPMorgan filed its Complaint in Eighth Judicial District Court, Case No. A-20-825633-C [ECF No. 1-1];
2. On December 1, 2020, Fidelity National filed its Petition for Removal to this Court [ECF No. 1];
3. On January 28, 2021, Fidelity National filed a Motion to Dismiss [ECF No. 22];

- 1 4. On January 28, 2021, Fidelity also filed a Motion to Dismiss [ECF No. 23];  
2 5. On January 28, 2021, Fidelity Agency also filed a Motion to Dismiss [ECF No. 24];  
3 6. JPMorgan's deadline to respond to Defendants' Motions to Dismiss is currently  
4 February 11, 2021;  
5 7. JPMorgan's counsel is requesting an extension until March 15, 2021, to file its  
6 response to the pending Motions to Dismiss;  
7 8. This extension is requested to allow JPMorgan additional time to finalize and file its  
8 response to the pending Motions to Dismiss as lead handling counsel for JPMorgan  
9 continues to recover from an unexpected medical emergency.  
10 9. Counsel for Defendants does not oppose the requested extension;  
11 10. This is the first request for an extension which is made in good faith and not for  
12 purposes of delay.

13 **IT IS SO STIPULATED.**

14 DATED this 11<sup>th</sup> day of February, 2021.

DATED this 11<sup>th</sup> day of February, 2021.

15 WRIGHT, FINLAY & ZAK, LLP

SINCLAIR BRAUN LLP

16 /s/ Lindsay D. Robbins

/s/ Kevin S. Sinclair

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19 *Attorneys for Plaintiff, JPMorgan Chase*  
20 *Bank N.A.*

*Attorney for Defendants, Fidelity National*  
*Title Group, Inc., Fidelity National Title*  
*Insurance Company, and Fidelity National*  
*Title Agency of Nevada*

22 **IT IS SO ORDERED.**

23 Dated this 3rd day of March, 2021.

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25 \_\_\_\_\_  
26 UNITED STATES DISTRICT COURT JUDGE  
27  
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